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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA – NORTHERN DIVISION**

8 TESORO REFINING & MARKETING
9 COMPANY LLC, a Delaware limited liability
10 company,

11 Plaintiff,

12 v.

13 ALANDDON LLC, a Nevada limited liability
company; KIM FIEGEHEN, as Guardian ad
Litem for DONALD A. LEHR, individually;
14 VALARIE M. LEHR, individually; and KIM
FIEGEHEN, as Guardian ad Litem, for ALLAN
15 G. FIEGEHEN, individually.

16 Defendants.

CASE NO.: 3:19-cv-00449-LRH-WGC

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
RESPONSE TO DEFENDANT'S
MOTIONS FOR PROTECTIVE ORDERS
(ECF No. 50 and ECF No. 51) AND
MOTION FOR PARTIAL SUMMARY
JUDGMENT (ECF No. 46)**

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22 Plaintiff TESORO REFINING & MARKETING COMPANY LLC (“Tesoro”), by and
23 through its attorneys of record, Griffith Hayes, Esq. of the law firm of LITCHFIELD CAVO LLP,
24 and ALANDDON LLC, VALARIE M. LEHR, and KIM FIEGEHEN, as Guardian Ad Litem, for
25 ALLAN G. FIEGEHEN and DONALD A. LEHR (collectively referred to as “Defendants”) by and
26 through their counsel of record, Ryan Russell, Esq. of the law firm of ALLISON MACKENZIE, LTD.,
27 do hereby stipulate and agree as follows:

- 28 1. Plaintiff filed its first amended complaint on November 15, 2019 (ECF No. 17).

1 2. Defendants filed their answer to the amended complaint on May 29, 2020 (ECF 32).

2 3. The current deadlines, pursuant to the stipulated discovery plan and scheduling order –
3 third request are: Discovery Cut-Off – April 13, 2021; Amend the pleading or add parties – February
4 26, 2021; Initial Expert Disclosure: February 14, 2021; Rebuttal Expert Disclosure: March 15, 2021;
5 Dispositive Motion Deadline: May 18, 2021 and Joint Pre-Trial Order: June 29, 2021.

6 4. On December 23, 2020, Defendants filed their Motion for Partial Summary Judgment
7 on Plaintiff's Second Claim for Relief (Breach of Contract against Guarantors)(the "MPSJ")(ECF No.
8 46).

9 5. Plaintiff's response to Defendants MPSJ is February 5, 2021 pursuant to Court Order
10 (ECF No. 49).

11 6. In response to the Motion that was filed on December 23, 2020, counsel for Plaintiff
12 has requested deposition dates for Donald Lehr and Allan Fiegehen and a former employee of
13 Alanddon LLC, Craig Furr.

14 7. The deposition of Craig Furr is scheduled for February 2, 2021.

15 8. On January 19, 2021, Defendants filed their Motion for Protective Order that Allan G.
16 Fiegehen Not Be Deposed (ECF No. 50) and Motion for Protective Order that Donald Lehr Not Be
17 Deposed (ECF No. 51) (the "Motions for Protective Orders").

18 9. Plaintiff's response to the Defendants' Motions for Protective Orders is February 2,
19 2021.

20 10. On January 27, 2021, Defendants' counsel agreed to extend the deadline for Plaintiff
21 to file its response to the Motions for Protective Orders (ECF Nos. 50 and 51) to and including Friday,
22 February 11, 2021.

23 11. Defendant's counsel also agreed that Plaintiff's response to Defendant's MPSJ (ECF
24 No. 46) shall be not be due until after the Motions for Protective Orders (ECF Nos. 50 and 51) have
25 been ruled on. Both counsel agreed that Plaintiff's response to the Defendant's MPSJ will be due
26 March 31, 2021, to allow the Court time to rule on the Motions for Protective Orders.

27 12. Plaintiff has previously obtained an extension in regard to Defendant's MPSJ (ECF No.
28 46). This is Plaintiff's first request for extension of time to respond to the Motions for Protective

1 Orders (ECF Nos. 50 and 51).

2 **IT IS SO STIPULATED.**

3 Dated: January 28, 2021

LITCHFIELD CAVO LLP

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12 Dated: January 28, 2021

ALLISON MacKENZIE, LTD.

13 By: /s/ Ryan Russell, Esq.
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20 Attorneys for Defendants

21 **IT IS SO ORDERED** that the deadline for Plaintiff to file its response to the Motions for
22 Protective Orders (ECF Nos. 50 and 51) to and including Friday, February 12, 2021.

23 **IT IS FURTHERED ORDERED** that the deadline for Plaintiff to file its response to
24 Defendant's MPSJ (ECF No 46) is March 31, 2021.

25 Date: January 29, 2021.

26 Warren G. Cobb
27 **United States Magistrate Judge**
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